



Mr. Klaus Koegler
Unit G 4
DG Environment
European Commission
Avenue de Beaulieu 5
1160 Brussels
Belgium

Brussels, 12 October 2007

Dear Mr. Koegler,

I am writing to you on behalf of IAIOA (The International Antimony Oxide Industry Association) in the context of the recent Commission consultation for the revision of the RoHS Directive.

We noted that two stakeholders, namely the Danish Environmental Ministry and the Göteborg University, suggested the inclusion of Antimony Trioxide (ATO) in the list of substances to be restricted by the RoHS Directive in the future. We would like to take the opportunity to outline here some general comments on Antimony Trioxide as well as to reply more specifically to the submissions sent.

ATO has been the subject of more than 12 years of science from expert toxicologists representing national and international government safety bodies. ATO has been subject of a toxicological review by the World Health Organisation (WHO) in 2003 in which, following an extensive review of the latest scientific data, the WHO guideline value was increased from 5 µg/l to 20 µg/l in drinking water, reflecting increased margins of consumer safety.

It is currently undergoing an EU Scientific Risk Assessment, according to European Regulation 793/93/EC. The European Commission has set a deadline of April 2008 for the completion of all EU risk assessments and it is expected that the current Antimony Trioxide Risk Assessment will be concluded by that time. Current results of the Swedish Rapporteur indicate that ATO is neither acutely toxic to human health, nor a risk to the environment.

ATO is the major catalyst for the production of PET plastic in the packaging of mineral water and soft drinks. It is already regulated and approved as safe under the legislation material in contact with foodstuffs and that on mineral water.

In addition ATO is used as a flame retardant synergist when certain flame retardants are added to plastics including those used in electrical and electronic applications.

Consequently, we would urge the Commission not to prejudge the EU Risk Assessment nor ATO's future REACH registration as these regulatory processes will determine the proportionate and adequate measures to be adopted.

Yours sincerely,

Karine Van de Velde
Secretary General
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A handwritten signature in blue ink, appearing to read 'Karine Van de Velde', is written over a horizontal line.